

New York | Los Angeles

7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

www.pryorcashman.com
James A. Janowitz

Direct Tel: 212-326-0873 Direct Fax: 212-798-6357 jjanowitz@pryorcashman.com

January 23, 2014

BY HAND

The Honorable Thomas P. Griesa United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

USDC SDNY
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Re:

Allianz Risk Transfer AG, et al. v. Paramount Pictures Corporation,

No. 08-CV-10420 (TPG)

Dear Judge Griesa:

We are counsel to the Plaintiffs in the above-referenced action, and we write on behalf of all parties to propose a revised schedule for the Court's consideration. The final non-expert deposition has now been completed, and the parties are working to resolve all remaining fact discovery issues without Court intervention. The parties are now prepared to enter the expert phase pursuant to the following schedule, subject to the Court's approval:

- the deadline for parties to identify their experts shall be February 14, 2014;
- the deadline for the parties to serve all expert reports shall be March 15, 2014;
- the deadline for the parties to serve any rebuttal expert reports shall be April 4, 2014; and
- all expert discovery shall be completed by May 9, 2014.

If the above is acceptable to the Court, we respectfully request that this letter be soordered. The parties anticipate motions for summary judgment will be made following the

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completion of expert discovery, and we will endeavor to reach agreement and propose a schedule for such motions.

Respectfully submitted,

ines A. Janowitz

cc: Mr. Jon Beal

Allan J. Arffa, Esq.

Leslie Gordon Fagen, Esq. Andrew J. Ehrlich, Esq. Patrick J. Somers, Esq.

Richard Kendall, Esq. Robert Klieger, Esq.

Phil Kelly, Esq. Bryan Mohler, Esq.

(all by email attachment)

SO ORDERED:

HON. THOMAS P. GRIESA, USDJ

1/29/14